

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
TAMPA DIVISION**

**ALVA JOHNSON,  
Individually and on behalf of all others  
similarly situated,**

**Case No. 8:19-cv-475-T-02SPF**

**Plaintiff,**

**vs.**

**DONALD J. TRUMP, In his Individual  
Capacity and DONALD J. TRUMP  
FOR PRESIDENT, INC.,**

**Defendants.**

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**MOTION FOR PERMISSION FOR  
F. PAUL BLAND TO APPEAR PRO HAC VICE**

Janet R. Varnell of the law firm of Varnell & Warwick, P.A., as counsel for Plaintiff, Alva Johnson, on behalf of herself and all others similarly situated (“Plaintiff”), hereby respectfully requests that this Court enter an Order permitting F. Paul Bland to appear *pro hac vice* as co-counsel for Plaintiff in this action. In support of this Motion, the undersigned states as follows:

1. This application is made pursuant to Local Rule 2.02 of this Court.
2. F. Paul Bland is a member in good standing of the bar of the District of Columbia; California and Maryland. Mr. Bland is in good standing and licensed to practice in the United States District Court for the District of Maryland; the United States Courts of Appeal for the Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth and Eleventh Circuits, and in the United States Supreme Court. There are no pending disciplinary proceedings against Mr. Bland in any state or federal court. Mr. Bland has never been convicted of a felony.

Mr. Bland has never been censured, suspended, disbarred, or denied admission or readmission by any court.

3. Mr. Bland is not a resident of Florida and does not make frequent or regular appearances in separate cases to such a degree to constitute the maintenance of a regular practice of law in the State of Florida.

4. Mr. Bland's office address is Public Justice, P.C., 1620 L Street NW, Suite 630, Washington, DC 20036; telephone: (202) 797-8600; e-mail: [pbland@publicjustice.net](mailto:pbland@publicjustice.net).

5. Mr. Bland is familiar with the Rules of this Court, including Rule 2.04, and is familiar with, and will be governed by, the Code of Professional Responsibility and other ethical limitations or requirements governing the professional behavior of members of the Florida bar.

6. In accordance with the local rules of this Court, Mr. Bland's completed Special Admission Attorney Certificate form has been forwarded to the Clerk of the Court. It is further certified that Mr. Bland has complied with the fee and e-mail registration requirements as required by Local Rule 2.01(d).

7. Mr. Bland, by and through designated counsel and pursuant to Rule 2.02 of the CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to [pbland@publicjustice.net](mailto:pbland@publicjustice.net).

8. Mr. Bland is associated with local counsel, Janet R. Varnell, of the law firm of Varnell & Warwick, P.A. Ms. Varnell is a resident of Florida and maintains an office in this District for the practice of law. She is a member in good standing of the Florida Bar and is an active member to the bar of this Court. She is the person with whom the Court and opposing counsel may readily communicate, upon whom all notices and papers may be served, and who

will be responsible for the progress of the case, including the trial in default of the non-resident attorney, Mr. Bland.

**Rule 3.01(g) Certification**

Counsel for Defendants have not entered an appearance and pursuant to Local Rule 3.01(g), the undersigned is unable to confer with opposing counsel to determine if they have any objection to the relief sought in this motion.

WHEREFORE, the undersigned respectfully requests that this Court enter an Order permitting Mr. Bland to practice before this Court for the limited purposes of representing Plaintiff in this action.

Dated: March 7, 2019

**VARNELL & WARWICK, P.A.**

By: /s/ Janet R. Varnell  
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Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 7, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Janet R. Varnell

Janet R. Varnell

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**ORDER ON MOTION FOR ADMISSION TO APPEAR PRO HAC VICE**

THIS CAUSE came before the Court upon Janet R. Varnell's Motion under Local Rule 2.02 asking the Court to allow F. Paul Bland for Admission to Appear Pro Hac Vice on behalf of Plaintiff in this case. Having considered the motion and all other papers submitted and the records and files herein, and having determined that all conditions to admission as counsel *pro hac vice* have been satisfied, it is

ORDERED AND ADJUDGED that the Motion for Admission for F. Paul Bland to Appear *Pro Hac Vice* is GRANTED.

DONE AND ORDERED in Orlando, Florida, this \_\_\_\_ day of \_\_\_\_\_, 2019.

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Sean P. Flynn  
United States District Judge

Copies furnished to:  
All counsel of record